

EXHIBIT A

From: Theresa Troupson <ttroupson@lftcllp.com>
Sent: Thursday, June 5, 2025 12:00 AM
To: Andrew Villacastin; Bender, Kristin; Summer Benson
Cc: Sigrid McCawley; Lindsey Ruff; Rachael Schafer; Esra Hudson; sroeser@manatt.com; Matthew Bruno; Katelyn Climaco; Gottlieb, Michael; Governski, Meryl Conant; Nathan, Aaron E.; Connolly, Michaela; katebolger@dwt.com; Sam Cate-Gumpert; Chip Babcock; Joel Glover; Bryan Freedman; Miles Cooley; Jason Sunshine; Local MS. Counsel; Local KAF. Counsel; mitra@ahouraianlaw.com; Christina Puello; Cortni Davis; Vaneta Birtha; Jose Perez; Taustine, Melissa
Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-cv-10049 (LJL) (rel. No. 25 Civ. 779)
Attachments: 2025.06.04_ Notice of Deposition of Blake Lively (Wayfarer_Lively)(427788).pdf

*** EXTERNAL EMAIL ***

Kristin,

We agree to your proposal as to the number of total depositions. We suggest that the parties work toward an agreement as to how to “count” depositions of third parties that both sides wish to take; for example, if both sides wished to depose the same third party, the parties could split the time equally and count it as one-half toward the total of twenty.

Please see the attached notice of deposition.

Regards,

Theresa M Troupson
Partner
LINER FREEDMAN TAITELMAN + COOLEY LLP
1801 Century Park West, 5th Floor
Los Angeles, California 90067
Telephone: (310) 201-0005
Facsimile: (310) 201-0045
Web: www.lftcllp.com

Please note that LFTC’s domain name has changed from FTLLP.com to LFTCLLP.com. Emails sent from this domain are not spam.

From: Theresa Troupson
Sent: Monday, June 2, 2025 3:13 PM
To: Andrew Villacastin <AVillacastin@BSFLLP.com>; Bender, Kristin <KBender@willkie.com>; Summer Benson <sbenson@lftcllp.com>
Cc: Sigrid McCawley <smccawley@bsfllp.com>; Lindsey Ruff <LRuff@BSFLLP.com>; Rachael Schafer <rschafer@bsfllp.com>; Esra Hudson <EHudson@manatt.com>; sroeser@manatt.com; Matthew Bruno <MBruno@manatt.com>; Katelyn Climaco <KCLimaco@manatt.com>; Michael Gottlieb <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; katebolger@dwt.com; Sam Cate-Gumpert <SamCateGumpert@dwt.com>; Chip Babcock

<cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puella <cpuella@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Taustine, Melissa <MTaustine@willkie.com>

Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-cv-10049 (LJL) (rel. No. 25 Civ. 779)

Kristin, we are reviewing your proposal and will get back to you on our position as soon as possible.

Theresa M Troupson
Partner
LINER FREEDMAN TAITELMAN + COOLEY LLP
1801 Century Park West, 5th Floor
Los Angeles, California 90067
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Facsimile: (310) 201-0045
Web: www.lftcllp.com

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From: Andrew Villacastin <AVillacastin@BSFLLP.com>

Sent: Monday, June 2, 2025 3:11 PM

To: Bender, Kristin <KBender@willkie.com>; Theresa Troupson <ttroupson@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>

Cc: Sigrid McCawley <smccawley@bsfllp.com>; Lindsey Ruff <LRuff@BSFLLP.com>; Rachael Schafer <rschafer@bsfllp.com>; Esra Hudson <EHudson@manatt.com>; sroeser@manatt.com; Matthew Bruno <MBruno@manatt.com>; Katelyn Climaco <KClimaco@manatt.com>; Michael Gottlieb <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; katebolger@dwt.com; Sam Cate-Gumpert <SamCateGumpert@dwt.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puella <cpuella@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Taustine, Melissa <MTaustine@willkie.com>

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This proposal makes sense to us, Kristin. (Sorry for the delayed response.)

Best,
Andrew

Andrew Villacastin (he/him/his)
Partner

BOIES SCHILLER FLEXNER LLP
55 Hudson Yards
New York, NY 10001
(t) +1 212 909 7628
avillacastin@bsfllp.com

www.bsflp.com

From: Bender, Kristin <KBender@willkie.com>
Sent: Friday, May 30, 2025 12:12 PM
To: Theresa Troupson <ttroupson@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>
Cc: Sigrid McCawley <smccawley@bsflp.com>; Andrew Villacastin <AVillacastin@BSFLLP.com>; Lindsey Ruff <LRuff@BSFLLP.com>; Rachael Schafer <rschafer@bsflp.com>; Esra Hudson <EHudson@manatt.com>; sroeser@manatt.com; Matthew Bruno <MBruno@manatt.com>; Katelyn Climaco <KClimaco@manatt.com>; Michael Gottlieb <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; katebolger@dwt.com; Sam Cate-Gumpert <SamCateGumpert@dwt.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Taustine, Melissa <MTaustine@willkie.com>
Subject: RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-cv-10049 (LJL) (rel. No. 25 Civ. 779)

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Counsel,

As we confirm availability, an antecedent issue is confirming how many depositions the parties will be allotted in the consolidated cases.

The Lively/Reynolds Parties propose 20 depositions for each side. This proposal accounts for the numerous parties in the consolidated actions, including those that are both plaintiffs and defendants on distinct claims. Under this reciprocal approach, Lively, Reynolds, Vision PR, and Sloane would have 20 depositions collectively, and Wayfarer, Baldoni, Heath, Sarowitz, It Ends With Us, Nathan, TAG, Wallace, and Street Relations would have 20 depositions collectively.

Parties in the related action would be responsible for their own agreement, if any, as to depositions. However, deponents who are deposed in the related action and the consolidated actions should not be required to attend more than one sitting (recognizing that this may result in multi-day sittings and without limitation on the standard 7-hour time limit).

We ask that the parties provide their positions on the above by 5 pm EST on Monday, June 2.

Best,
KB

Kristin Bender
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)
kbender@willkie.com | vCard | www.willkie.com/bio

From: Theresa Troupson <ttroupson@lftcllp.com>
Sent: Tuesday, May 27, 2025 8:18 PM
To: Summer Benson <sbenson@lftcllp.com>
Cc: Sigrid McCawley <smccawley@bsflp.com>; Andrew Villacastin <AVillacastin@bsflp.com>; Lindsey Ruff

<LRuff@bsfllp.com>; Rachael Schafer <rschafer@bsfllp.com>; Esra Hudson <EHudson@manatt.com>; sroeser@manatt.com; Matthew Bruno <MBruno@manatt.com>; Katelyn Climaco <KClimaco@manatt.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Bender, Kristin <KBender@willkie.com>; katebolger@dwt.com; Sam Cate-Gumpert <SamCateGumpert@dwt.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Local MS. Counsel <ms@msf-law.com>; Local KAF. Counsel <kaf@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>

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*** EXTERNAL EMAIL ***

Counsel:

Please provide your clients' availability for deposition dates in the range of July 17-August 14, 2025.

Regards,
Theresa Troupson

On May 23, 2025, at 7:25 PM, Summer Benson <sbenson@lftcllp.com> wrote:

Counsel,

At the link provided below, please find an initial production of documents, which includes documents bearing Bates numbers WAYFARER_000000001 – WAYFARER_000007413. We will continue to produce documents on a rolling basis.

<https://sftp-na3.transperfect.com/>

The credentials necessary to access the production will be transmitted via a separate email.

Please be advised that documents in this production are designated Confidential pursuant to the Protective Order entered at ECF No. 125. This production is made subject to, and without waiver of, previously stated objections.

Should you experience any difficulty accessing the documents, please do not hesitate to contact me.

Summer E. Benson, Esq.
LINER FREEDMAN TAITELMAN + COOLEY LLP
1801 Century Park West, 5th Floor
Los Angeles, California 90067
Telephone: (310) 201-0005
Facsimile: (310) 201-0045
Web: www.lftcllp.com

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